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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

GURU DENIM, INC., a California
Corporation dba TRUE RELIGION
BRAND JEANS,

Plaintiff,
vs.

KAN CAN USA, INC., a California Corporation; SANG JUN SONG, an individual; ANDREA'S FASHION, an unknown business entity; and DOES 1-10, inclusive,

Defendants.

CASE NO. CV 12-4333 PA (FMOx)

ORDER RE:

**STIPULATION TO CONSENT
JUDGMENT INCLUDING
PERMANENT INJUNCTION AND
VOLUNTARY DISMISSAL OF
DEFENDANT ANDREA'S FASHION**

WHEREAS Plaintiff **Guru Denim, Inc. dba True Religion Brand Jeans** and Defendant **Andrea's Fashion** have entered into a Settlement Agreement and Mutual Release as to the claims in the above referenced matter. Defendant, having agreed to consent to the below terms, it is hereby:

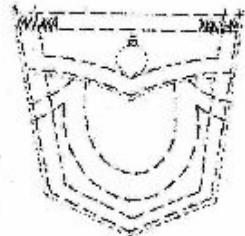
ORDERED, ADJUDGED, and DECREED as among the parties hereto that:

1. This Court has jurisdiction over the parties to this Final Consent Judgment and has jurisdiction over the subject matter hereof pursuant to 15 U.S.C. § 1121.

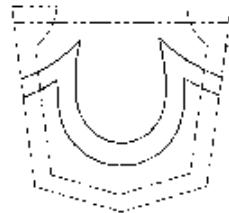
2. Plaintiff is the owner of the trademark registrations for word marks “TRUE RELIGION” (registrations include but are not limited to U.S. Reg. Nos. 3,628,973 and 3,162,614) and “TRUE RELIGION BRAND JEANS” (registration

include but are not limited to U.S. Reg. Nos. 2,761,793 and 3,120,797), as well as various composite trademarks comprising said word marks and assorted design components (collectively “True Religion Marks”).

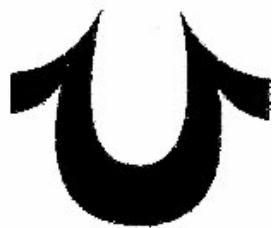
3. True Religion's "U" marks, which are well-known and highly recognized. True Religion has used the "U" marks in association with the sale of goods, including jeans, jackets, and shorts, since as early as 2002. One of the "U" marks was registered at the U.S Patent and Trademark office in 2006. Since then, True Religion has used various composites and variations of the "U" marks on its goods, most of which have been registered with the United States Patent and Trademark Office. Registrations for the "U" marks include, but are not limited to the following (collectively "True Religion's "U" Marks").



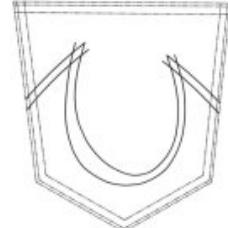
(U.S. Reg. No. 3,561,466)



(U.S. Reg. No. 3,147,244)



(U.S. Reg. No. 3,482,001)



(U.S. Reg. No. 3,568,127)

4. Plaintiff has alleged that Defendant's purchase, importation, distribution, advertisement, offering for sale, and sale of products which infringe upon True Religion's "U" Marks ("Disputed Products") constitute trademark infringement, trademark dilution, and unfair competition under the Lanham Trademark Act, and under the common law.

5. Defendant and its agents, servants, employees and all persons in active concert and participation with them who receive actual notice of this Final Consent

1 Judgment are hereby permanently restrained and enjoined from infringing upon
2 Plaintiff's trademarks either directly or contributorily in any manner, including:

3 (a) Manufacturing, purchasing, producing, distributing, circulating,
4 selling, offering for sale, importing, exporting, advertising, promoting, displaying,
5 shipping or marketing the Disputed Products as well as any goods bearing a mark or
6 feature identical and/or confusingly similar to the True Religion Marks;

7 (b) Delivering, holding for sale, returning, transferring or otherwise
8 moving, storing or disposing in any manner the Disputed Products and/or any products
9 bearing marks identical and/or confusingly similar to Plaintiff's True Religion Marks;

10 (c) Using the True Religion Marks or any reproduction, counterfeit,
11 copy or colorable imitation thereof in connection with the manufacture, importation,
12 distribution, advertisement, offer for sale and/or sale of merchandise comprising not
13 the genuine products of Plaintiff, or in any manner likely to cause others to believe that
14 Defendants' products are connected with Plaintiff or Plaintiff's genuine merchandise;

15 (d) Committing any other acts calculated to cause purchasers to believe
16 that Defendants' products are Plaintiff's genuine merchandise or associated with
17 Plaintiff in any way;

18 (e) Assisting, aiding or attempting to assist or aid any other person or
19 entity in performing any of the prohibited activities referred to in Paragraphs 5(a) to
20 5(d) above.

21 6. Plaintiff and Defendant shall bear their own costs and attorneys' fees
22 associated with this action.

23 7. The execution of this Consent Judgment shall serve to bind and obligate
24 the parties hereto.

25 8. The jurisdiction of this Court is retained for the purpose of making any
26 further orders necessary or proper for the construction or modification of this Final
27 Judgment, the enforcement thereof and the punishment of any violations thereof.

28 Except as otherwise provided herein, this action is fully resolved with prejudice as to

1 Defendant Andrea's Fashion only. The terms of this Consent Judgment is not intended
2 to affect, and should not be construed to affect, Plaintiff's claims against any other
3 parties in the Action.

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5 **IT IS SO ORDERED.**

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7 DATED: October 12, 2012

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Hon. Percy Anderson
United States District Judge

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